Statement of Account

324 W Freemason Street Norfolk, VA 23510 United States Phone (757) 350-8308 Fax (757) 351-4663 Joe@lawfirmJVS.com

Wayne Lynch, Administrator Estate of Donovon W. Lynch

07/26/2023

00251-Lynch, AdministratorEstate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons: Estate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons

Billing Method: Hourly Responsible Attorney: None

Date	Activity	Due Date	Invoice Amount	Payments	Balance
	Opening Balance				\$0.00
01/27/2023	Invoice #2399	01/27/2023	\$6,133.70		\$6,133.70
03/31/2023	Invoice #2519	03/31/2023	\$7,429.59		\$13,563.29
06/20/2023	Invoice #2739	06/20/2023	\$11,075.00		\$24,638.29
06/20/2023	Payment on invoice #2399			\$2,500.00	\$22,138.29
07/26/2023	Invoice #2869	07/26/2023	\$6,206.39		\$28,344.68

Balance Due: \$28,344.68

Overdue Balance: \$22,138.29

Thank you for the opportunity to be of service. Please call if you have questions: (757) 350-8308.

324 W Freemason Street Norfolk, VA 23510 United States Phone (757) 350-8308 Fax (757) 351-4663 Joe@lawfirmJVS.com

STATEMENT OF PROFESSIONAL SERVICES RENDERED

Statement # 2399 Date: 01/27/2023

Wayne Lynch, Administrator Estate of Donovon W. Lynch

Estate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons

Services

Type	Date	Notes	Quantity	Rate	Total
Service	12/27/2022	Receive and review multiple emails from client; open file; review joint motion filed to enforce settlement agreement; draft letter to client.	0.90	\$250.00	\$225.00
Service	12/28/2022	Review file; telephone conference with client; draft Motion to Substitute Counsel; notes to file.	0.70	\$250.00	\$175.00
Service	12/28/2022	Review, revise, and file Motion to Substitute Attorney; draft and send email to client; notes to file.	1.00	\$250.00	\$250.00
Service	12/29/2022	Review media inquiry from Channel 13; draft email to client; telephone conference with Jeff Reichert; review and revise email to client; notes to file.	1.10	\$250.00	\$275.00
Service	12/29/2022	Review Memorandum in Law in support of joint motion to enforce settlement agreement and documents in support; notes to file.	0.20	\$250.00	\$50.00
Service	12/30/2022	Receive and review email from channel 13; draft and send response; telephone conference with client; notes to file.	1.90	\$250.00	\$475.00
Service	12/30/2022	Multiple telephone calls with client; multiple emails with client revising press release; draft and send emails to press; notes to file.	0.60	\$250.00	\$150.00
Service	01/05/2023	Review file; draft and send email to client; telephone conference with Josh Coe, Esq.; notes to file.	1.00	\$250.00	\$250.00

Service	01/05/2023	Pull minutes from the Virginia Beach City Council meeting 12/6/2022; notes to file.	0.30	\$75.00	\$22.50
Service	01/05/2023	Draft Memorandum in Opposition to Joint Motion to Enforce Settlement Agreement.	2.20	\$250.00	\$550.00
Service	01/06/2023	Draft Motion to Enforce Memorandum of Understanding; draft Memorandum in Support of Motion to Enforce MOU; review and revise Memorandum in Opposition to Joint Motion to Enforce Settlement Agreement.	1.10	\$250.00	\$275.00
Service	01/06/2023	Review and revise Memorandum in Opposition to Settlement Agreement; review file; notes to file.	1.70	\$250.00	\$425.00
Service	01/06/2023	Review and revise Memorandum in Opposition to Enforcement of Settlement Agreement; notes to file.	0.60	\$250.00	\$150.00
Service	01/10/2023	Review notice of electronic filing of transcript; review docket; fill out transcript order form.	0.30	\$250.00	\$75.00
Service	01/11/2023	Review Motion to Approve Proposed Distribution of Settlement Funds; outline arguments.	0.30	\$250.00	\$75.00
Service	01/11/2023	Research timeline of media events; memo to jvs. Update file with federal court filings; notes to file.	1.00	\$75.00	\$75.00
Service	01/12/2023	Receive and review text from client; telephone call to client; notes to file.	0.10	\$250.00	\$25.00
Service	01/12/2023	Telephone conference with client; notes to file.	0.30	\$250.00	\$75.00
Service	01/12/2023	Receive and review Reply brief filed by Officer Simmons; notes to file.	0.10	\$250.00	\$25.00
Service	01/12/2023	Review and revise Memorandum in Opposition to Motion to Approve Distribution of Settlement Funds; notes to file.	2.40	\$250.00	\$600.00
Service	01/13/2023	Telephone conference with Chris Boynton, Esq.; notes to file.	0.30	\$250.00	\$75.00
Service	01/13/2023	Receive and review transcript of October 31, 2022, proceeding before Magistrate Judge Krask; notes to file.	0.50	\$250.00	\$125.00
Service	01/13/2023	Draft email to client; notes to file.	0.30	\$250.00	\$75.00
Service	01/14/2023	Review emails from client; draft and send responses; telephone conference with Tom Martin, Esq.; telephone conference with client; notes to file.	1.30	\$250.00	\$325.00
Service	01/17/2023	Prepare letter to opposing counsel for mailing.	0.10	\$250.00	\$25.00
Service	01/19/2023	Draft Plaintiff's Request for Hearing.	0.20	\$250.00	\$50.00
Service	01/20/2023	Review and revise Request for Hearing; notes to file.	0.10	\$250.00	\$25.00

Service	01/25/2023	Telephone conference with client; notes to file.	1.60	\$250.00	\$400.00
Service	01/25/2023	Review email from Ibrahim Reyes; notes to file.	0.20	\$250.00	\$50.00
Service	01/26/2023	Review file; notes to file.	0.20	\$250.00	\$50.00
Service	01/27/2023	Outline strategy; draft motion for emergency hearing; notes to file.	0.10	\$250.00	\$25.00
Service	01/27/2023	Review file; review and revise Motion for an Emergency Hearing; draft and send email to client; email state bar ethics hotline; receive and review response from state bar ethics hotline; notes to file.	2.50	\$250.00	\$625.00

Services Subtotal \$6,072.50

Expenses

Type	Date	Notes	Quantity Rate	Total
Expense	01/13/2023	Reimbursable expenses: Transcript of Proceedings October 31, 2022	1.00 \$61.20	\$61.20
			Expenses Subtotal	\$61.20
			Subtotal	\$6,133.70
			Total	\$6,133.70
		Pa	ayment (06/20/2023)	-\$2,500.00
			Balance Owing	\$3,633.70

Detailed Statement of Account

Other Invoices

Statement Number	Due On	Amount Due	Payments Received	Balance Due
2519	03/31/2023	\$7,429.59	\$0.00	\$7,429.59
2739	06/20/2023	\$11,075.00	\$0.00	\$11,075.00
2869	07/26/2023	\$6,206.39	\$0.00	\$6,206.39

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due

\$3,633.70	\$2,500.00	1/27/2023 \$6,133.70		2399
\$28,344.68	Outstanding Balance			
\$28,344.68	Total Amount Outstanding	т		

Escrow Account

Date	Type	Notes	Matter	Disbursements	Deposits	Balance
05/26/2023		Received from Wayne Lynch	00251-Lynch, AdministratorEstate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons		\$2,500.00	\$2,500.00
06/20/2023		Payment on bill #2399	00251-Lynch, AdministratorEstate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons	\$2,500.00		\$0.00

Escrow Account Balance \$0.00

Thank you for the opportunity to be of service. Please call if you have questions: (757) 350-8308.

Payment is due upon receipt.

Late payment fees of 1.5% per month charged on all past due services and costs.

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STATEMENT OF PROFESSIONAL SERVICES RENDERED

Statement # 2519 Date: 03/31/2023

Wayne Lynch, Administrator Estate of Donovon W. Lynch

Estate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons

Services

Туре	Date	Notes	Quantity	Rate	Total
Service	02/01/2023	Meet and confer with Joseph V. Sherman, Esq.; return call of third-party citizen offering information; left message; citizen returned call, notes to file.	1.60	\$250.00	\$400.00
Service	02/08/2023	Review and revise cease and desist letter to Tom Martin, Esq., and Justin Fairfax; Esq., draft and send email to client; notes to file.	1.20	\$250.00	\$300.00
Service	02/08/2023	Draft confidential settlement brief; draft and send email to client; notes to file.	1.30	\$250.00	\$325.00
Service	02/09/2023	Receive and review email from client; review settlement brief from Justin Fairfax, Esq.,; draft and send email to client; notes to file.	0.40	\$250.00	\$100.00
Service	02/09/2023	Review and revise cease and desist letter to Justin Fairfax, Esq., and Tom Martin, Esq.; notes to file.	0.30	\$250.00	\$75.00
Service	02/13/2023	Receive and review email from client; draft and send response; receive and review reply from Ibrahim Reyes, Esq.; telephone conference with Ibrahim Reyes, Esq.; review and revise application to qualify as a foreign attorney; draft and send email to client; notes to file.	0.50	\$250.00	\$125.00
Service	02/13/2023	Receive and review email from client; draft and send email to client; notes to file.	0.20	\$250.00	\$50.00

Service	02/14/2023	Telephone conference with client; notes to file.	1.00	\$250.00	\$250.00
Service	02/14/2023	Create Estate file with all documents in preparation for Thursday's mediation.	6.00	\$75.00	\$450.00
Service	02/14/2023	Telephone conference with Hon. Lawrence Leonard; notes to file.	0.20	\$250.00	\$50.00
Service	02/15/2023	Review email from EDVA law clerk; review Va. Code 8.01-55; review case law on attorney's fees relating to statute; review proceedings in similar case referred by Magistrate Judge; meet with Joseph V. Sherman, Esq.; meet with extern to discuss assisting in mediation preparation.	1.00	\$250.00	\$250.00
Service	02/15/2023	Receive and review email from Judge Lawrence Leonard's clerk; forward to client; receive and review multiple emails from client; telephone conference with Josh Coe, Esq.; draft and send email to Judge Leonard's clerk; notes to file.	0.60	\$250.00	\$150.00
Service	02/16/2023	Assist Joseph V. Sherman prepare for mediation; drive to courthouse.	0.30	\$250.00	\$75.00
Service	02/16/2023	Prepare for and attend settlement conference with Hon. Leonard; notes to file.	5.50	\$250.00	\$1,375.00
Service	02/17/2023	Prepare letter to Justin Fairfax Esq. and Thomas Martin Esq. for mailing.	0.10	\$250.00	\$25.00
Service	02/21/2023	Receive and review email from Chris Boynton, Esq.; draft and send response; review redlined settlement agreement; notes to file.	0.10	\$250.00	\$25.00
Service	02/21/2023	Review email from Chris Boynton, Esq.; review proposed settlement agreement; notes to file.	0.20	\$250.00	\$50.00
Service	02/22/2023	Receive and review email from client; draft and send response; notes to file.	0.20	\$250.00	\$50.00
Service	02/27/2023	Review email from client; review various redline versions of settlement agreement; review and revise redline settlement agreement; draft and send email to client; notes to file.	0.60	\$250.00	\$150.00
Service	02/27/2023	Receive and review multiple emails from client; draft and send multiple responses; review and revise settlement agreement; notes to file.	0.30	\$250.00	\$75.00
Service	03/01/2023	Telephone conference with client; notes to file.	1.20	\$250.00	\$300.00
Service	03/02/2023	Review and revise settlement agreement; telephone conference with client; draft and send email to client; telephone conference with client; notes to file.	1.60	\$250.00	\$400.00
Service	03/03/2023	Receive and review docket correction; telephone message for Tonya Levinson in Clerk's office; receive and review email from client; review and revise draft	0.10	\$250.00	\$25.00

		settlement agreement; notes to file.			
Service	03/09/2023	Telephone message for client; receive and review emails from client and Court; draft and send email to Court; draft and send email to client; notes to file.	0.50	\$250.00	\$125.00
Service	03/09/2023	Prepare for and execute telephone conference with Hon. Leonard; text messages with client; notes to file.	0.60	\$250.00	\$150.00
Service	03/10/2023	Receive and review email from client; draft and send response; receive and review email from court; draft and send response; notes to file.	0.20	\$250.00	\$50.00
Service	03/10/2023	Review email from client; draft and send response; review file; draft and send email to court; notes to file.	0.40	\$250.00	\$100.00
Service	03/10/2023	Prepare for and execute telephone conference with Hon. Leonard; telephone conference with client; notes to file.	1.20	\$250.00	\$300.00
Service	03/16/2023	Multiple emails with Jeff Reichert, Esq.,; telephone conference with Ibrahim Reyes, Esq., Jeff Reichert, Esq., and Wayne Lynch; call with Wayne Lynch; emails with same; notes to file.	0.90	\$250.00	\$225.00
Service	03/16/2023	Multiple phone calls and emails with client; draft email to Christopher Boynton, Esq.; outline phone call with Christopher Boynton, Esq.; notes to file.	1.20	\$250.00	\$300.00
Service	03/21/2023	Receive and review email from client; draft and send response; review file; notes to file.	0.30	\$250.00	\$75.00
Service	03/24/2023	Receive and review email from Christopher Boynton, Esq.; draft and send email to client; telephone conference with client; notes to file.	0.50	\$250.00	\$125.00
Service	03/27/2023	Receive and review multiple emails from client; draft and send email to client; notes to file.	0.20	\$250.00	\$50.00
Service	03/28/2023	Telephone conference with client; review file; notes to file.	0.90	\$250.00	\$225.00
Service	03/30/2023	Telephone conference with Chris Boynton, Esq.; telephone conference with client; review file; notes to file.	1.70	\$250.00	\$425.00
Service	03/31/2023	Draft letter to client; notes to file.	0.50	\$250.00	\$125.00

Services Subtotal \$7,350.00

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	02/17/2023	Letters: Letter to Fairfax and Martin, copy to client.	3.00	\$1.53	\$4.59

Expense	03/02/2023	Reimbursable expenses: Application fee for Motion Pro Hac Vice.	for	1.00	\$75.00	\$75.00
			Expenses	Expenses Subtotal		\$79.59
				Subtot	al :	\$7,429.59
				Tot	al :	\$7.429.59

Detailed Statement of Account

Other Invoices

Statement Number	Due On	Amount Due	Payments Received	Balance Due
2399	01/27/2023	\$6,133.70	\$2,500.00	\$3,633.70
2739	06/20/2023	\$11,075.00	\$0.00	\$11,075.00
2869	07/26/2023	\$6,206.39	\$0.00	\$6,206.39

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
2519	03/31/2023	\$7,429.59	\$0.00	\$7,429.59
			Outstanding Balance	\$28,344.68
			Total Amount Outstanding	\$28,344.68

Please make all amounts payable to: Joseph V. Sherman, P.C.

Payment is due upon receipt.

324 W Freemason Street Norfolk, VA 23510 United States Phone (757) 350-8308 Fax (757) 351-4663 Joe@lawfirmJVS.com

STATEMENT OF PROFESSIONAL SERVICES RENDERED

Statement # 2739 Date: 06/20/2023

Wayne Lynch, Administrator Estate of Donovon W. Lynch

Estate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons

Туре	Date	Notes	Quantity	Rate	Total
Service	01/03/2023	Receive and review series of emails from Jeffrey Reichert, Esq. enclosing deposition transcripts and notice of settlement.	0.50	\$250.00	\$125.00
Service	01/09/2023	Receive and review email from Jeffrey Reichert, Esq.; draft and send email to Mr. Reichert; receive and review response from Mr. Reichert; receive and review email from Ibrahim Reyes; receive and review email from Christopher S. Boynton Esq.; receive and review email from Mr. Reichert.	0.50	\$250.00	\$125.00
Service	01/15/2023	Receive and review email from Tom Martin, Esq.; draft and send email to client; receive and review emails from Jeffrey Reichert.	0.20	\$250.00	\$50.00
Service	01/16/2023	Receive and review email from client.	0.10	\$250.00	\$25.00
Service	01/18/2023	Receive and review email from Jeffrey Reichert, Esq.	0.10	\$250.00	\$25.00
Service	01/19/2023	Receive and review email from Gerald Harris Esq.; receive and review email from Jeffrey Reichert, Esq.	0.10	\$250.00	\$25.00
Service	01/21/2023	Receive and review email from Jeffrey Reichert, Esq.	0.10	\$250.00	\$25.00
Service	01/28/2023	Receive and review email from Jeffrey Reichert; review and revise Emergency Motion for Hearing; file motion through ECF site.	0.30	\$250.00	\$75.00
Service	01/30/2023	Receive and review email from Ibrahim Reyes, Esq.; receive and review email from client.	0.10	\$250.00	\$25.00
Service	02/01/2023	Receive and review email from Jeffrey Reichert, Esq.;	0.20	\$250.00	\$50.00

		receive and review email from client.			
Service	02/02/2023	Receive and review email from Jeffrey Reichert Esq.; receive and review Order from Court.	0.10	\$250.00	\$25.00
Service	02/03/2023	Receive and review email from client.	0.10	\$250.00	\$25.00
Service	02/06/2023	Receive and review email from Jeffrey Reichert, Esq.; receive and review email from client; receive and review email from Mr. Reichert; receive and review email from client.	0.20	\$250.00	\$50.00
Service	02/07/2023	Receive and review email from Jeffrey Reichert Esq.	0.10	\$250.00	\$25.00
Service	02/10/2023	Receive and review email from client; draft and send email to Haley Tanner, law clerk to Judge Leonard; receive and review email from Ms. Tanner.	0.10	\$250.00	\$25.00
Service	02/20/2023	Receive and review email from Jeffrey Reichert, Esq.	0.10	\$250.00	\$25.00
Service	02/23/2023	Receive and review email from Jeffrey Reichert Esq.; receive and review email from Ibrahim Reyes Esq.; receive and review email from Christopher Boynton Esq.	0.20	\$250.00	\$50.00
Service	02/28/2023	Receive and review email from Christopher Boynton Esq.	0.10	\$250.00	\$25.00
Service	03/06/2023	Receive and review email from Christopher Boynton Esq.	0.10	\$250.00	\$25.00
Service	03/07/2023	Receive and review email from Jeffrey Reichert, Esq.; receive and review email from client; draft and send email to Christopher Boynton Esq.; receive and review email from Mr. Boynton.	0.20	\$250.00	\$50.00
Service	03/08/2023	Receive and review emails from Jeffrey Reichert Esq.; receive and review email from Angilee DiMartino, law clerk to Judge Leonard; draft and send email to Christopher Boynton Esq.; receive and review email from Mr. Boynton; receive and review email from Gerald Harris Esq.; receive and review email from Martin Esq.	0.60	\$250.00	\$150.00
Service	03/12/2023	Receive and review email from Jeffrey Reichert, Esq.	0.10	\$250.00	\$25.00
Service	03/13/2023	Receive and review email from Jeffrey Reichert Esq.; receive and review email from client.	0.10	\$250.00	\$25.00
Service	03/14/2023	Receive and review email from Christopher Boynton Esq.	0.10	\$250.00	\$25.00
Service	03/15/2023	Receive and review email from Jeffrey Reichert Esq.; receive and review emails from Haley Tanner, law clerk to Judge Leonard; draft and send email to Ms. Tanner; draft and send email to Mr. Reichert; receive and review email from Jeffrey Reichert; draft and send email to Mr. Reichert; receive and review email from	1.00	\$250.00	\$250.00

		Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; continued exchange of emails with Mr. Reichert; receive and review email from Ibrahim Reyes Esq.; draft and send email to Ms. Tanner; receive and review email from Angilee DiMartino, law clerk to Judge Leonard; receive and review email from Christopher Boynton Esq.			
Service	03/22/2023	Draft and send email to client; receive and review email from Jeffrey Reichert, Esq.; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; receive and review email from Mr. Reichert; receive and review email from client.	0.60	\$250.00	\$150.00
Service	03/25/2023	Receive and review email from Jeffrey Reichert Esq.	0.20	\$250.00	\$50.00
Service	03/29/2023	Receive and review email from Jeffrey Reichert; receive and review email to client; draft and send email to client; receive and review email from Mr. Reichert.	0.10	\$250.00	\$25.00
Service	04/03/2023	Receive and review email from client; draft and send response; draft and send email to Judge Leonard and City; notes to file.	0.40	\$250.00	\$100.00
Service	04/04/2023	Receive and review email from client; draft and send response; notes to file.	0.10	\$250.00	\$25.00
Service	04/05/2023	Review and revise Motion to Enforce Settlement Agreement; notes to file.	0.60	\$250.00	\$150.00
Service	04/05/2023	Thought energy toward a broken world; notes to file.	0.10	\$250.00	\$25.00
Service	04/05/2023	Review and revise Memorandum in Support of Motion to Enforce Memorandum of Understanding	1.90	\$250.00	\$475.00
Service	04/06/2023	Receive and review email from Brittney Titus, courtroom deputy for Judge Krask; receive and review email from Christopher Boynton Esq.; receive and review email from Tom Martin Esq.; receive and review email from Gary Bryant Esq.; draft and send email to Ms. Titus.	0.20	\$250.00	\$50.00
Service	04/07/2023	Receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review emails from Mr. Reichert.	0.30	\$250.00	\$75.00
Service	04/12/2023	Review file; telephone conference with Judge Krask; notes to file.	1.10	\$250.00	\$275.00
Service	04/13/2023	Meeting with client; review and outline strategy; draft and send email to client; notes to file.	0.90	\$250.00	\$225.00

Service	04/13/2023	Receive and review email from client; send email to Chris Boynton, Esq.; notes to file.	0.20	\$250.00	\$50.00
Service	04/13/2023	Review memorandum in opposition to Motion to Substitute Counsel; notes to file.	0.20	\$250.00	\$50.00
Service	04/14/2023	Receive and review email from Christopher Boynton Esq.; receive and review email from Jeffrey Reichert.	0.10	\$250.00	\$25.00
Service	04/17/2023	Receive and review emails from client; telephone conference with Chris Boynton, Esq.; draft and send email to Chris Boynton, Esq., and Gary Bryant, Esq.; review and revise joint stipulation; notes to file.	0.60	\$250.00	\$150.00
Service	04/17/2023	Receive and review email from Chris Boynton, Esq.; draft and send multiple emails to client.	0.40	\$250.00	\$100.00
Service	04/17/2023	Receive and review email from client; draft and send email to Chris Boynton, Esq.; notes to file.	0.20	\$250.00	\$50.00
Service	04/18/2023	Receive and review email from client.	0.10	\$250.00	\$25.00
Service	04/19/2023	Telephone conferences with potential substitute counsel in the event the City calls Joseph V. Sherman, Esq., as a witness during arbitration.	0.50	\$250.00	\$125.00
Service	04/25/2023	Receive and review email from Jeffrey Reichert Esq.	0.10	\$250.00	\$25.00
Service	04/28/2023	Receive and review email and letter from Tom Martin Esq.	0.10	\$250.00	\$25.00
Service	05/03/2023	Receive and review email from Tom Martin Esq; draft and send email to client; receive and review email from Jeffrey Reichert Esq.	0.10	\$250.00	\$25.00
Service	05/04/2023	Telephone conference with Erica of US Claims; notes to file.	0.10	\$250.00	\$25.00
Service	05/06/2023	Receive and review email from client; draft and send email to client.	0.10	\$250.00	\$25.00
Service	05/08/2023	Receive and review email from Brittney Titus, courtroom deputy for Judge Krask.	0.10	\$250.00	\$25.00
Service	05/10/2023	Receive and review email from Patricia Yoder, paralegal for Willcox Savage, enclosing subpoenas.	0.10	\$250.00	\$25.00
Service	05/15/2023	Review federal case law on enforcement of settlement agreements, notes to file.	0.20	\$250.00	\$50.00
Service	05/16/2023	Research and draft memorandum on standard of review for Fraudulent Inducement and Duress.	1.10	\$250.00	\$275.00
Service	05/16/2023	Meeting with client; outline case strategy; notes to file.	1.10	\$250.00	\$275.00
Service	05/16/2023	Receive and review email from Tom Martin, Esq.; draft and send response; notes to file.	0.10	\$250.00	\$25.00

Service	05/17/2023	Draft and send email to client; notes to file.	0.10	\$250.00	\$25.00
Service	05/18/2023	Receive and review email from Jeffrey Reichert Esq.; receive and review email from Patricia Yoder, paralegal for Willcox Savage; receive and review series of emails from Mr. Reichert for use at evidentiary hearing.	0.30	\$250.00	\$75.00
Service	05/19/2023	Receive and review emails from Jeffrey Reichert Esq. for use as evidence at hearing.	0.10	\$250.00	\$25.00
Service	05/20/2023	Receive and review emails from Jeffrey Reichert for use at evidentiary hearing.	0.10	\$250.00	\$25.00
Service	05/21/2023	Receive and review email from client.	0.10	\$250.00	\$25.00
Service	05/22/2023	Receive and review email from Jeffrey Reichert for use at evidentiary hearing; receive and review series of emails from client for evidentiary hearing.	0.20	\$250.00	\$50.00
Service	05/23/2023	Research case law on voiding contracts for fraud and duress for use at trial, notes to file; prepare documents for trial.	1.00	\$250.00	\$250.00
Service	05/23/2023	Prepare for trial; notes to file.	1.40	\$250.00	\$350.00
Service	05/23/2023	Prepare for evidentiary hearing; review file; outline strategy; notes to file.	1.50	\$250.00	\$375.00
Service	05/23/2023	Prepare for hearing; meet with client; notes to file.	2.50	\$250.00	\$625.00
Service	05/23/2023	Prepare for hearing; notes to file.	1.10	\$250.00	\$275.00
Service	05/24/2023	Assist Joseph V. Sherman Esq. prepare for trial	0.40	\$250.00	\$100.00
Service	05/25/2023	Prepare for and execute hearing on enforcement of settlement agreement; notes to file.	8.40	\$250.00	\$2,100.00
Service	05/26/2023	Receive and review email from Jeffrey Reichert Esq.; receive and review email from Tom Martin Esq.; receive and review emails from Mr. Reichert.	0.20	\$250.00	\$50.00
Service	05/27/2023	Telephone conference with client; notes to file.	0.60	\$250.00	\$150.00
Service	05/29/2023	Receive and review email from client; notes to file.	0.10	\$250.00	\$25.00
Service	05/30/2023	Review file; draft and send email to Tom Martin, Esq., requesting client file; draft and send email to Alex Sprio, Esq., confirming no lien; telephone conference with client; notes to file.	1.00	\$250.00	\$250.00
Service	05/31/2023	Draft and send email to Alex Spiro, Esq.; draft and send email to client; notes to file.	0.10	\$250.00	\$25.00
Service	06/01/2023	Draft Status Report of the Estate of Donovon W. Lynch.	0.30	\$250.00	\$75.00
Service	06/01/2023	Receive and reply to multiple emails; telephone conference; review and revise status report; review file; notes to file.	0.30	\$250.00	\$75.00

Service	06/02/2023	Email communication with client; notes to file.	0.10	\$250.00	\$25.00
Service	06/04/2023	Receive and review email from Jeffrey Reichert Esq.; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert.	0.20	\$250.00	\$50.00
Service	06/05/2023	Receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert.	0.10	\$250.00	\$25.00
Service	06/07/2023	Draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; receive and review email from Mr. Reichert; receive and review email from client; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert.	0.50	\$250.00	\$125.00
Service	06/08/2023	Draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; receive and review email from client.	0.10	\$250.00	\$25.00
Service	06/09/2023	Receive and review email from Jeffrey Reichert Esq.; receive and review emails from client; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; draft and send email to client; draft Motion to Withdraw at client's insistence; draft and send email to client; receive and review email from Mr. Reichert; draft and send email to Mr. Reichert; receive and review email from Mr. Reichert; receive and review email from client.	0.50	\$250.00	\$125.00
Service	06/13/2023	Review Court's Order of June 5, 2023; discuss strategy with Joseph V. Sherman, Esq.; outline Statement of Costs and Fees; draft Motion for Disbursement of Settlement Funds.	0.80	\$250.00	\$200.00
Service	06/14/2023	Outline Memorandum in Support of Motion for Distribution of Settlement Funds; review and review Motion for Distribution of Settlement Funds; review and revise outline for Statement of Fees and Costs.	1.20	\$250.00	\$300.00
Service	06/14/2023	Review file; telephone conference with client; draft and send email to client; notes to file.	0.50	\$250.00	\$125.00
Service	06/15/2023	Review and revise Motion to Withdraw.	0.40	\$250.00	\$100.00
Service	06/20/2023	Receive and review email from Christopher Boynton Esq.; receive and review email from Jeffrey Reichert Esq.	0.20	\$250.00	\$50.00
Service	06/20/2023	Review and revise Motion for Disbursement; communication with client; notes to file.	2.50	\$250.00	\$625.00

Subtotal \$11,075.00

Detailed Statement of Account

Other Invoices

Statement Number	Due On	Amount Due	Payments Received	Balance Due
2399	01/27/2023	\$6,133.70	\$2,500.00	\$3,633.70
2519	03/31/2023	\$7,429.59	\$0.00	\$7,429.59
2869	07/26/2023	\$6,206.39	\$0.00	\$6,206.39

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
2739	06/20/2023	\$11,075.00	\$0.00	\$11,075.00
			Outstanding Balance	\$28,344.68
			Total Amount Outstanding	\$28,344.68

Please make all amounts payable to: Joseph V. Sherman, P.C.

Payment is due upon receipt.

324 W Freemason Street Norfolk, VA 23510 United States Phone (757) 350-8308 Fax (757) 351-4663 Joe@lawfirmJVS.com

STATEMENT OF PROFESSIONAL SERVICES RENDERED

Statement # 2869 Date: 07/26/2023

Wayne Lynch, Administrator Estate of Donovon W. Lynch

Estate of Donovon Lynch v. City of Virginia Beach and Officer Solomon Simmons

Services

Туре	Date	Notes	Quantity	Rate	Total
Service	06/22/2023	Telephone conference with Patrick O'Donnell, Esq.; notes to file.	0.10	\$295.00	\$29.50
Service	06/27/2023	Review briefs submitted by Anchor Legal Group and Justin Fairfax, Esq. re disbursement of attorney's fees; calendar deadlines from Court's Order of June 23, 2023; draft Memorandum in Support of Motion for Approval of Disbursement	1.60	\$250.00	\$400.00
Service	06/27/2023	Review and revise Memorandum in Support of Motion to Disburse Settlement Funds; notes to file.	0.40	\$250.00	\$100.00
Service	06/28/2023	Review and revise Memorandum in Support of Motion for Approval of Settlement.	1.50	\$250.00	\$375.00
Service	06/29/2023	Review and revise Memorandum in Support of Motion for Approval of Settlement; review and revise Affidavit of Lauryn Lynch; notes to file.	0.70	\$250.00	\$175.00
Service	06/29/2023	Draft Affidavit of Lauryn Lynch; review and revise Memorandum in Support of Motion for Approval of Settlement.	0.90	\$250.00	\$225.00
Service	06/30/2023	Review and revise affidavit of Lauryn Lynch; review and revise Memorandum in Support of Motion for Approval of Settlement; draft and send email to client; notes to file.	0.30	\$250.00	\$75.00
Service	06/30/2023	Review and revise Memorandum in Support of Motion for Approval of Settlement; draft proposed order for distribution of proceeds.	0.60	\$250.00	\$150.00

Service	07/03/2023	Review emails from Trey Kelleter, Esq.; draft and send responses to Try Kelleter, Esq.; notes to file.	0.10	\$250.00	\$25.00
Service	07/03/2023	Telephone conference with Trey Kelleter, Esq.; draft and send email to client and Try Kelleter, Esq.; notes to file.	0.70	\$250.00	\$175.00
Service	07/03/2023	Review file; draft and send email to Trey Kelleter, Esq., and client; notes to file.	0.20	\$250.00	\$50.00
Service	07/03/2023	Receive and review email from Trey Kelleter, Esq.; draft and send responses; notes to file.	0.20	\$250.00	\$50.00
Service	07/04/2023	Review and revise Memorandum in Support of Motion for Disbursement; notes to file.	0.30	\$250.00	\$75.00
Service	07/05/2023	Review and revise Memorandum in Support of Motion to Approve Settlement; receive email from Trey Kelleter, Esq.; revise proposed Order; notes to file.	0.30	\$250.00	\$75.00
Service	07/11/2023	Travel to pick up hard drive; to and from Anchor Legal to drop off hard drive.	1.30	\$75.00	\$97.50
Service	07/12/2023	Review city's response to Motion for Approval of Settlement, notes to file.	0.50	\$250.00	\$125.00
Service	07/13/2023	Draft Reply in Support of Motion for Approval of Settlement.	1.80	\$250.00	\$450.00
Service	07/14/2023	Meet and confer with William B. Newman, Esq. regarding receipts produced by Attorneys Martin and Fairfax; research, review, and prepare spreadsheet of expenses.	2.40	\$75.00	\$180.00
Service	07/14/2023	Receive and review email from Jeffrey Reichert, review revisions to Reply in Support of Motion to Approve Settlement; outline and research Memorandum in Opposition to Justin Fairfax, Esq. claim for fees.	2.50	\$250.00	\$625.00
Service	07/14/2023	Travel to and from Anchor Legal to pick up hard drive after providing a DNA sample.	0.90	\$75.00	\$67.50
Service	07/17/2023	Update pleadings and file in preparation for rebuttal of attorneys' fees.	1.80	\$75.00	\$135.00
Service	07/19/2023	Review and revise Memorandum in Opposition to Claim for Costs and Fees by Justin Fairfax, Esq. and Tom Martin, Esq.	0.90	\$250.00	\$225.00
Service	07/20/2023	Review and revise Memorandum in Opposition to Claim for Costs and Fees by Justin Fairfax, Esq. and Tom Martin, Esq.	2.00	\$250.00	\$500.00
Service	07/20/2023	Review and revise brief opposing fee claim by Justin Fairfax, Esq. and Tom Martin, Esq.; notes to file.	0.30	\$250.00	\$75.00
Service	07/21/2023	Review and revise Memorandum in Opposition to Claim for Costs and Fees.	3.60	\$250.00	\$900.00
Service	07/21/2023	Review and revise memorandum in opposition to Justin Fairfax, Esq. and Tom Martin, Esq fee request; notes to	1.20	\$250.00	\$300.00

email from Trey Kelleter, Esq.; review and revise Memorandum in Response to Justin Fairfax, Esq. and Tom Martin, Esq; file memorandum on docket; draft and send email to client; notes to file. Service 07/24/2023 Telephone conference with Trey Kelleter, Esq.; notes to 0.10 \$250.00 \$ file.	\$25.00
email from Trey Kelleter, Esq.; review and revise Memorandum in Response to Justin Fairfax, Esq. and Tom Martin, Esq; file memorandum on docket; draft and send email to client; notes to file. Service 07/24/2023 Telephone conference with Trey Kelleter, Esq.; notes to 0.10 \$250.00 \$	
email from Trey Kelleter, Esq.; review and revise Memorandum in Response to Justin Fairfax, Esq. and Tom Martin, Esq; file memorandum on docket; draft	\$25.00
Service 07/21/2023 Telephone conference with Trey Kelleter, Esq.; review 0.30 \$250.00 \$	\$75.00
Service 07/21/2023 Review and revise memorandum in opposition to Justin 0.80 \$250.00 \$2 Fairfax, Esq. and Tom Martin, Esq fee; draft and send email to client; notes to file.	200.00
Service 07/21/2023 Review and revise memorandum in opposition; notes to 0.40 \$250.00 \$1 file.	100.00
Fairfax, Esq. and Tom Martin, Esq fee request; notes to file.	

Expenses

Type	Date	Notes	Quar	ntity	Rate	Total
Expense	07/11/2023	Reimbursable expenses: WD - My Passport 5TB External USB 3.0 Portable Hard Drive - Black Model: WDBPKJ0050BBK-WESN SKU: 6380848		1.00	\$121.89	\$121.89
			Expenses	Subt	otal	\$121.89
				Subt	otal	\$6,206.39
				T	otal	\$6,206.39

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Current Statement

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2869	07/26/2023	\$6,206.39	\$0.00	\$6,206.39
			Outstanding Balance	\$28,344.68
			Total Amount Outstanding	\$28,344.68

		Total Account Balance	\$0.00
Escrow Account Balance			\$0.00
	Account		Balance

Please make all amounts payable to: Joseph V. Sherman, P.C.

Payment is due upon receipt.